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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**MICHAEL G. SCHWERN,**  
**Plaintiff,**

v.

**NÓIRÍN PLUNKETT,**  
**Defendant.**

Case No. 3:14-cv-00146-PK

**DEFENDANT'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE TO PLAINTIFF'S  
MOTION FOR SANCTIONS  
AGAINST DEFENDANT**

**LR 7-1(A) CERTIFICATION**

Undersigned counsel certifies that the parties conferred through telephone conference to resolve the issue presented herein and Plaintiff does not oppose this motion.

## **INTRODUCTION**

Counsel for Plaintiff Michael G. Schwern and for Defendant Nóirín Plunkett have agreed that the deadline to file an Opposition to Plaintiff's Motion for Sanctions Against Defendant may be extended to allow for the orderly determination of Plaintiff's Motion to Lift Stay Pending Appeal for a Limited Purpose.

The Motion for Sanctions and the Motion to Lift Stay are both currently set for argument on June 23, 2015. Plaintiff's motions were filed on the same day, but the Motion to Lift Stay is logically precedent. If the Court determines not to lift the stay, no further briefing or hearing on the sanctions motion would be required. Granting an extension of time to respond to the Motion for Sanctions would serve the purpose of judicial economy and beneficially narrow the focus of the briefing and hearing currently scheduled. This unopposed motion to defer the time for Plunkett to respond to the Motion for Sanctions would be needed in the event that the Court lifts the stay.

## **MOTION**

Defendant Nóirín Plunkett requests an extension of time to file a response to Plaintiff's Motion for Sanctions, deferring that date until 14 days after the June 23, 2015 hearing on the Plaintiff's Motion to Lift Stay Pending Appeal for a Limited Purpose; and requests that the hearing on the Motion for Sanctions be deferred until the Court determines whether the stay should be lifted.

Dated: May 22, 2015

Respectfully submitted,

/s/ Dan Booth

Daniel G. Booth (admitted *pro hac vice*)

*Counsel for Defendant*

### **CERTIFICATE OF SERVICE**

I hereby certify that I served a true copy of the foregoing document by using the Court's ECF system on this 22nd day of May, 2015, thereby causing a true copy of said document to be served electronically upon counsel of record for each other party.

/s/ Dan Booth